

ARTHUR J. LOGAN MAJOR GENERAL ADJUTANT GENERAL

KENNETH S. HARA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

January 24, 2017

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, D.C. 20554

Re: WT Docket No. 02-378 Region 11 (Hawaii) 700 MHz Regional Plan

Aloha Ms Dortch:

The Chair of the Hawaii Statewide Interoperability Executive Board (SIEB) and the Chair of the Region 11 700 MHz Regional Planning Committee (RPC) hereby submit Reply Comments to the National Regional Planning Council (NRPC) comments filed in the above referenced docket on January 13, 2017.

The NRPC indicated it is in general agreement with the Region 11 Plan; it then provided two comments which we address in this Reply. Briefly:

NRPC: Section 7.1 "Interference Protection" lacks sufficient clarity and detail, specifically noting the plan provides no definition of the co-channel or adjacent channel signal levels to be used to identify potential interference.

Region 11 Reply: The Region 11 RPC appreciates the comments of the NRPC. As noted in the content of the Notice, there are no regions adjacent to Region 11. The Region 11 RPC will evaluate the NRPC recommendations, and consider their co-channel evaluation contour process and the adoption of this method at a future RPC meeting.

NRPC: In Section 8.5 "Channel Loading Recommendations" the NRPC feels the channel loading parameters lack a consideration for improvements in technology providing increased channel loading capacity. Encouraging the use of TDMA will help reduce the number of channels necessary to deploy systems and help keep channels available for new systems, or future expansion of existing systems.

Region 11 Reply: Although not directly stated in this Section of the Region 11 Plan as submitted, the RPC encourages the use of spectrally efficient technologies (6.25 kHz equivalent protocols) as shown in the Plan's Application Matrix Point System (Section 10.5) used to evaluate applications.

Ms. Marlene H. Dortch January 24, 2017 Page 2

In conclusion, the members of the Region 11 RPC and the State of Hawaii SIEB express appreciation for the Comments provided by the NRPC and look forward to a continued working relationship upon approval of the Region 11 Plan.

Respectfully,

ARTHUR JALOGAN

Major General

Hawaii National Guard

Adjutant General

Warren Izumigawa

Chairperson

Region 11 (Hawaii)

700 MHz Regional Planning Committee

cc: David Y. Ige, Governor, State of Hawaii

David Furth, Deputy Chief John Evanoff, Attorney Advisor

Victoria Garcia, SWIC

Dolores Cook, Office of Homeland Security